REMARKS

The objection to claims 1-14 for numbers and enclosing brackets is not well taken, because no numbers are in brackets. Nevertheless, the applicant notes:

> Reference characters corresponding to elements recited in the detailed description of the drawings may be used in conjunction with the recitation of same element or groups of elements in the claims. The reference characters, however, should be enclosed within parentheses .... The use of reference characters is to be considered as having no effect on the scope of the claims. *MPEP* 608.01(m)

Claim 11 is amended as requested without narrowing or, therefore, Festo-like limitations.

The rejection of claim 2 under 35 USC 101 is not well taken, as differences between random numbers and numbers algorithmically generated to represent them are generally understood. Nevertheless, amendment is made without narrowing or, therefore, Festo-like limitations.

The rejection of independent claim 1 and dependent claims under 35 USC 103 for obviousness from the cited Bauer, et al. (hereafter Bauer), Clark, et al. (hereafter Clark) and Luke, et al. (hereafter Luke) patent publications is traversed for want of rational underpinning.

> ... [R]ejections on obviousness cannot be sustained by mere conclusory statements; instead there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness. *Examination Guidelines for Determining Obviousness Under 35 U.S.C. 103 in View of the Supreme Court Decision in KSR International Co. v. Teleflex Inc.*, Fed. Reg. October 10, 2007, 57526, 57528-9.

In this regard, first of all, we have an opinion that the inventive concept of the claimed invention is totally different from that of Bauer. Bauer discloses a method for accessing a file using different file name formats. In a background of Bauer, there are multiple computers which use different Operating Systems. In the embodiment of Fig. 1, user computers 102, 103, ... are connected via LAN 104 to a file server 105, where the file server 105 operates with UNIX OS and user computers 102, 103, ... are operates with MS-DOS, MAC OS, or foreign language OS such as Spanish. As mentioned in BACK GROUND OF THE INVENTION in Col. 1, a respective OS has its own file name format and, therefore, the object of Bauer is to make it possible to access files created and named by other operating systems.

According to the embodiment of Fig. 8 of Bauer, directory 800 is provided. In this embodiment, for example, file entry 803 contains STANDARD FILE NAME "MEETING AGENDA" 813 which can be handled with the file server 105 using UNIX OS, ALTNAME 1 "MEETING.AGE" 823 which can be handled with a user computer using MS-DOS, ALTNAME 2 "MEETING.AGE" 833 which can be handled with a user computer using MAC OS, and ALTNAME 3 "LA AGENDA DE LA REUNEON" 843 which can be handled with a user computer using Spanish OS.

As mentioned in Col. 10, lines 20-27, respective ALTNAMEs are computed from STANDARD FILE NAME by the server 100 using a particular algorithm. For example, ALTNAME 1 for MS-DOS is obtained by eliminating blank spaces and coerce into 8.3-character format. "MEETING.AGE" is obtained from "MEETING AGENDA" based on this algorithm. As mentioned in Col. 10, lines 28-57, user computers can access UNIX files referring such a directory 800 in Fig. 8. For example, when a MS-DOS client computer 103

accesses the server 100, only ALTNAME 1's are presented on the MS-DOS client computer 103, that is, 821, 823, 825 are listed on a display of computer 103 and the user finds file names "RESUME", "MEETING.AGE", "CHILDHOO.ADV" on the list. If the user selects "CHILDHOO.ADV" on the list, he/she can access UNIX file of "CHILDHOOD ADVENTURES" through the procedure mentioned in Col. 10, line 58 to Col. 11, line 6.

In the above-described procedure of Bauer, STANDARD FILE NAME (UNIX filename format) would be corresponding to "filename-for-storage" in the present invention and ALTNAME 1 (MS-DOS filename format) would be corresponding to "filename-for-user" in the present invention, if these two inventions have any common concepts.

Here, note the following facts which are very important to distinguish the present invention from Bauer.

FACT 1: The Bauer's system comprising server 100 operating under UNIX OS and a user client computer 103 operating under MS-DOS. In other words, it is prerequisite for Bauer to provide at least two computers which operates under different OSs.

FACT 2: Server 100 computes an ALTNAME (filename-for-user) from STANDARD FILE NAME (filename-for-storage) using a particular algorithm. That is, when a new file is stored under a filename-for-storage such as "MEETING AGENDA" in server 100, a filename-for-user such as "MEETING.AGE" is computed. The filename conversion from "filename-for-storage" to "filename-for-user" is carried out using a particular algorithm.

FACT 3: Presentation of filename list to the user is carried out in the user client computer 103 operating under MS-DOS which is different from UNIX OS under which the server 100 operates.

The object of Bauer is to enable access a file which has been created under different OS from that used in a user computer; whereas, the object of the claimed invention is to provide a computer system enabling adequate security to be ensured even for filenames. The object of the claimed invention is almost opposite to that of Bauer. Bauer helps a user try to access a file which has been created by others, but the claimed invention disturbs such a user by hiding real file names.

With respect to FACT 1: the computer system of the present invention does not need plural computers which operates under different OSs. As shown in Fig. 2, program execution unit 20 contains an OS program and application programs and this system operates under this sole OS program.

With respect to FACT 2: according to the computer system of the present invention, storage control unit 35 carries out filename conversion from "filename-for-user" to "filename-for-storage" using a particular algorithm, when a new file is stored, though the server 100 of Bauer carries out filename conversion from "filename-for-storage" to "filename-for-user."

With respect to FACT 3: according to the computer system of the present invention, presentation of filename list to the user is carried out by filename presentation unit 60, which operates under the same OS program contained in program execution unit 20.

Considering the above-described FACTs, amended claim 1 is not obvious from Bauer, in view of Clark and Luke, because it claims:

> a storage control unit (35), which, when the storage processing unit (30) is storing a file, inputs a filename-for-user under operation of said OS program from the user who is logged in, executes a filename conversion process of converting the filename-for-user to a filename-for-storage based on a predetermined algorithm, and provides to the storage processing unit an instruction to perform storage using the filename-for-storage.

A storage control unit carries out an input procedure of "filename-for-user" under operation of said OS program on which a program execution unit applies processes. In Bauer's system, "filename-for-user" such as "MEETING.AGE" would be selected by a user on a client computer 103. However, the client computer 103 operates under MS-DOS which is not the same OS on which the server 100 applies processes.

Further, as mentioned above, in Bauer, the server 100 carries out filename conversion from "filename-for-storage" to "filename-for-user" when a new file is stored, but does not carry out filename conversion from "filename-for-user" to "filename-for-storage." The server 100 does carry out filename conversion from "filename-for-user" to "filename-for-storage" when a user tries to access a file by selecting "filename-for-user" such as "MEETING.AGE." However, such a conversion is carried out when a file is to be readout, but not when a file is to be stored.

> [A] correspondence information storage unit (80), which, when the filename conversion process is carried out by the storage control unit (35), stores information, indicating a correspondence between the filename-for-user and the filename-for-storage, as filename correspondence information for the user who is logged-in

of claim 1 is not disclosed in Bauer.

Fig. 3 of the present invention shows an example of correspondence tables between "filename-for-user" and "filename-for-storage." The left table is for user alpha and the right table is for user beta. That is, "filename correspondence information for a user" is stored. Fig. 8 of Bauer shows correspondence tables between "filename-for-users" such as "MEETING.AGE" 823 for MS-DOS, "MEETING.AGE" 833 for MAC OS, "LA AGENDA DE LA REUNEON" 843 for Spanish system, and "filename-for-storage" such as "MEETING AGENDA." However, these tables are for an OS, but not for a user who is logged-in.

> [A] presentation control unit (65), which, when the filename presentation unit (60) is performing a presentation of filenames under operation of said OS program, references filename correspondence information for the user who is logged in from inside the correspondence information storage unit (80) and provides an instruction to present the filename-for-user in place of the filename-for-storage based on the filename correspondence information referenced so that said filename presentation unit presents the filename-for-user instead of the filename-for-storage if a correspondence of the filename-for-storage is indicated in the referenced filename correspondence information, whereas said filename presentation unit presents the filename-for-storage as it is if no correspondence of the filename-for-storage is indicated in the referenced filename correspondence information

of claim 1 is not disclosed in Bauer.

The filename presentation unit performs a presentation of filenames under operation of said OS program on which a program execution unit applies processes. In Bauer's system, as mentioned in FACT3, presentation of filename list to the user is carried out in the user client computer 103 operating under MS-DOS which is different from UNIX OS under which the server 100 operates.

The presentation control unit references filename correspondence information for a logged-in user. In Bauer's system, filename correspondence information for an OS is provided, but filename correspondence information for a user who is logged-in is not

provided.

Further, according to the system of claim 1, the presentation unit presents the "filename-for-user" instead of the "filename-for-storage" if a correspondence of the "filename-for-storage" is indicated in the referenced filename correspondence information, but the "filename-for-storage" is presented as it is if no correspondence of the "filename-for-storage" is indicated in the referenced filename correspondence information.

This unique feature is mentioned in page 18, lines 11-23 of the specification as follows. Bauer does not disclose this unique feature.

Such a filename list display is carried out since presentation control unit 65 references the filename correspondence information for the currently logged-in user from inside correspondence information storage unit 80. For example, when user α is logged in, since the correspondence table of filename correspondence information for user α, shown at the left side of FIG. 3, is referenced. Therefore, a display through conversion to the filenames-for-user "sales book for April," "sales book for May," and "sales book for June" is carried out for the filenames-for-storage, "RST123," "UVW456," and "XYZ789," which are indicated in the relevant correspondence table, whereas the filenames-for-storage, "ABC147," "DEF258," and "GHI369," which are not indicated in the relevant correspondence table, are displayed as they are, and the list display is thus performed as shown in FIG. 5A.

> [A] spread control unit (45), which, when the spread processing unit (40) spreads data, inputs an instruction of selection of a filename-for-user under operation of said OS program from the user who is logged in, references filename correspondence information for the user who is logged in from inside the correspondence information storage unit, executes a filename conversion process of converting the selected filename-for-user to a filename-for-storage based on the correspondence information referenced, and provides, to the spread processing unit, an instruction to spread data in a file with the filename-for-storage resulting from the conversion

of claim 1 is not disclosed in Bauer.

An spread control unit carries out an input procedure of selecting "filename-for-user" under operation of said OS program on which a program execution unit applies processes. In Bauer's system, "filename-for-user" such as "MEETING.AGE" would be selected by a user on a client computer 103. However, the client computer 103 operates under MS-DOS which is not the same OS on which the server 100 applies processes.

The spread control unit references filename correspondence information for a logged-in user. In Bauer's system, filename correspondence information for an OS is provided, but filename correspondence information for a user who is logged-in is not provided.

In Paragraph [0637] of Clerk, "In one embodiment, the synchronization service does not provide its own... This utility makes it very easy to configure the Windows Scheduler to run synchronization either on schedule or in response to events such as user logon or logoff."

However, the teaching of Clerk is just "to provide a synchronization service in response to user logon or logoff." The fundamental concept of the present invention is to change a filename of a data so that only a particular user who creates the data can recognize an original proper filename to ensure security for a filename. This fundamental concept is not disclosed in Bauer, Clerk, or Luke or, thereby, any combination thereof. Without this fundamental concept, there is no rational underpinning for a person of ordinary skill in the art at the time of invention to attain the present invention by incorporating the teaching of Clerk or Luke into the system of Bauer. The aim of Bauer is to access a file which has been created under a different OS. Therefore, there is no rational underpinning, for example by motivation, to incorporate the teaching of Clerk or Luke into the apparatus of Bauer.

The rejection of independent claim 13 under 35 USC 103 from just the combination of Bauer and Clark is traversed for the same reasons as described above.

The other, dependent claims become allowable with their parent claims 1 and 13.

Reconsideration and allowance are, therefore, requested.

Respectfully submitted,

William R. Evans
c/o Ladas & Parry LLP
26 West 61st Street
New York, New York 10023
Reg. No. 25858
Tel. No. (212) 708-1930